

STRADLEY, RONON, STEVENS & YOUNG, LLP
A Pennsylvania Limited Liability Partnership
By: Francis X. Manning
Woodland Falls Corporate Park
200 Lake Drive East, Suite 100
Cherry Hill, NJ 08002
(856) 321-2400
Attorneys for Defendant
Chase Home Finance LLC

UNITED STATES COURT DISTRICT
FOR THE DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)

STACEY COLEMAN, fka Stacey Kovilaritch: individually and as a class representative on behalf of others similarly situated,	:	No. 1:08-cv-02215-NLH-JS
	:	
	:	
Plaintiff,	:	
	:	
	:	
vs.	:	NOTICE OF RULE 12(b)(1)
	:	AND (6) MOTION TO DISMISS
CHASE HOME FINANCE, LLC, successor-by-merger to CHASE MANHATTAN MORTGAGE	:	PLAINTIFF'S FIRST
CORP. and John Doe 1-100 and John Doe Servicers 1-1-100,	:	AMENDED COMPLAINT
	:	
Defendant.	:	FILED ELECTRONICALLY
	:	Return Date: August 3, 2009
	:	

TO: Lewis G. Adler, Esquire
26 Newton Avenue
Woodbury, NJ 08096

PLEASE TAKE NOTICE that on August 3, 2009, at 9:00 in the forenoon or as soon thereafter as counsel may be heard, defendant Chase Home Finance LLC, through its attorneys, will move before this Court at the Mitchell H. Cohen U.S. Courthouse, 1 John F. Gerry Plaza, Camden, New Jersey 08101, pursuant to Federal Rule of Civil Procedure 12(b)(1) and (6) and the Local Rules of the U.S. District Court for the District of New Jersey, for an Order dismissing the First Amended Complaint in its entirety, with prejudice.

In support thereof, Defendant relies on and incorporates herein by reference the accompanying Brief and Declaration of Francis X. Manning. A proposed form of Order also is enclosed.

Oral argument is requested if the motion is opposed.

Respectfully submitted,

/s/ Francis X. Manning

Francis X. Manning
Andrew K. Stutzman
STRADLEY, RONON, STEVENS
& YOUNG, LLP
A Pennsylvania Limited Liability
Partnership
Woodland Falls Corporate Park
200 Lake Drive East, Suite 100
Cherry Hill, NJ 08002
(856) 321-2400
fmanning@stradley.com
astrutzman@stradley.com

Of Counsel

LeAnn Pedersen Pope (*pro hac*
pending)
Stephen R. Meinertzhagen (*pro hac*
pending)
BURKE, WARREN, MACKAY &
SERRITELLA, P.C.
330 North Wabash Avenue, 22nd
Floor
Chicago, IL 60611
(312) 840-7000
lpope@burkelaw.com
smeinertzhagen@burkelaw.com